



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 28, 2020

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Joseph Bagaglia, 19 Cr. 342 (LGS)**

Dear Judge Schofield:

The Government respectfully submits this letter, with consent from defense counsel, requesting an adjournment of the status conference currently scheduled in this case for Thursday, April 30, 2020 at 11 a.m. The Government and the defendant are currently engaged in discussions regarding a pretrial disposition in this case, and those discussions have been delayed by the ongoing pandemic and will not be resolved by the next scheduled status conference state. Accordingly, the Government requests that the status conference be adjourned 60 days to allow the parties to continue their discussions. Furthermore, the Government, for the same reasons, moves, with consent from defense counsel, to exclude time under the Speedy Trial Act until the next scheduled status conference.

Application Granted. The status conference currently scheduled for April 30, 2020 is adjourned to June 30, 2020 at 11:00 a.m. For the reasons stated below, the Court finds that the ends of justice served by excluding the time between today and June 30, 2020 outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h) (7)(A). It is hereby ORDERED that the time between today and June 30, 2020 is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 29.

Dated: April 28, 2020  
New York, New York

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by:                     /s/                      
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Assistant United States Attorney  
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**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**